



Friends of Griffith Park

P.O. Box 27573
Los Angeles, CA 90027-0573
friendsofgriffithpark.org

June 14, 2016

Ms. Linda Lou
City of Los Angeles Department of City Planning
200 N Spring St, Rm 667, Mailstop 395
Los Angeles, CA 90012
Via: linda.lou@lacity.org

Dear Ms. Lou,

Friends of Griffith Park is a charitable non-profit organization focused on advocacy, service, education, and support of Griffith Park, the most significant of parks falling within the boundaries of the Hollywood Community Plan. We have focused the following comments specifically on parks, recreation, and protecting LA's great urban wilderness areas for generations in the future.

The following are comments which we hope the City will act upon for the Hollywood Community Plan (HCP) Draft EIR:

1. WILDLIFE CONNECTIVITY

The Hollywood Freeway bisects large habitat areas decreasing the extent of important wildlife migration. Yet, wildlife travel across the freeway and at other risky or near-impassable zones. A recent example is mountain lion P-22, who has made Griffith Park his home for well over four years, coming from a genetic population far in the western Santa Monica Mountains.

Connectivity across the Santa Monica Mountains - including Griffith Park - is crucial for species to maintain sufficient genetic variability. The recent City Council action, CF #14-0518 Wildlife Corridor Motion (Koretz), underscores the need to plan into the future to avert unhealthy wildlife populations or localized extinctions due to genetic depression.

OUR REQUEST:

Considering the fact that the Hollywood Community Plan area contains vast amount of habitat and also critical choke points with failing or limited wildlife linkages, the Plan must address the issue and give priority consideration to wildlife connectivity. This is especially true for the Cahuenga Pass corridor, but is also important where habitat connects with the LA River.

2. SIGNIFICANT ECOLOGICAL AREA

The HCP should also include a reference that Griffith Park is designated as a "Significant Ecological Area (SEA)" by the General Plan of Los Angeles County. SEA designation is given to land that contains irreplaceable biological resources. Per the County's General Plan, "The objective of the SEA Program is to conserve genetic and physical diversity by designating biological resource areas that are capable of sustaining themselves into the future."

3. THE NEED FOR MORE PARKS

According to *2016 City Park Facts*, produced by The Trust for Public Lands, Los Angeles ranks near the bottom of all U.S. cities in the number of playgrounds per population (1.1 per 10,000). Los Angeles also ranks near the bottom for “walkable park access (one-half mile)”. In fact, only 55% of LA residents are within a half-mile of any type of park. While the Department of Recreation and Parks has made improvements on these dire statistics in recent years, Hollywood has seen no improvement.

The City’s Public Recreation Element of the General Plan’s criteria for parkland acreage is cited in the proposed text for the HCP. However, in reporting whether the existing conditions meet these three separate criteria, the conclusion is obscured by totaling all acreage and dividing by the population. This is not an acceptable methodology for an analysis of recreational needs of the community. The total acreage figure is biased by huge Griffith Park which, on its own, does not satisfy the goals per the General Plan criteria.

The reason why the City General Plan separates criteria by types of parks is that each provides unique purposes, and they serve varying needs of the citizens of Los Angeles. The vast acreage of Griffith Park, considered “regional parkland”, provides a wilderness experience and satisfies multiple passive recreational needs, such as hiking. It also has various facilities and attractions such as golfing, concessions and museums. Regional parks, according to the City General Plan, generally serve a larger audience, persons from throughout the Los Angeles basin.

Neighborhood parks, according to the General Plan, should provide space and facilities for outdoor and indoor recreational activities. It is intended to serve residents of all ages in its immediate neighborhood.

Community parks, according to the General Plan, should be designed to serve residents of all ages in several surrounding neighborhoods. Its facilities serve a much wider interest range than do those of a Neighborhood site.

Regarding “standards” for parkland, the General Plan also says: A satisfactory recreation system must measure up to accepted standards in three respects: first, there must be sufficient land area set aside for recreation; second, the recreation areas must be properly distributed in residential areas; and third, there must be facilities to meet different recreation needs - including both active and passive recreation, and have provisions for all age groups.

A portion of the Community parkland deliverables may be somewhat served by Griffith Park which is within reasonable distance from some of the Hollywood Community Plan Area. The General Plan sets this guideline: 1) A service radius of a community site is approximately 2 miles, and 2) the community park should be easily accessible to the area served.

The General Plan sets these guidelines for Neighborhood Parkland: “The service radius of a neighborhood recreational site is approximately one-half mile. The park space should be located within a neighborhood so that users are not required to cross a major arterial street or highway when walking to the site.”

While there is mention of a need for more Neighborhood parkland, it is the type of parkland which is severely lacking from a planning perspective in the proposed text for the HCP. These are the small “pocket parks” or “mini-parks” which should be detailed now as a part of the planning process, not in the future. While some of the needs may be met with sharing arrangements with public schools per Policy CF.5.34, there are not enough specifics to support this to ever occur, such as which have “school-specific” agreements.

OUR REQUEST:

We request that Table 5-1 show the actual acres per 1,000 residents statistics for each park type that is identified in the General Plan. The statement that, “total parkland acreage in Hollywood is nearly twice the number of acres required to meet the standard established by the City’s Public Recreation Element” is misleading and not accurate. A strong plan should be put in place to correct, rather than perpetuate, the lack of parks and recreational facilities in the Hollywood Community Plan Area, so to conform to the standards set by the City General Plan.

4. EQUESTRIAN TRAILS, MAP 39

Map 39 overstates the extent of Griffith Park equestrian trails and should be corrected with input from someone who knows the park trails.

5. POLICY CF.5.66 - TRAILS

This policy presently recommends expanding equestrian trails and hiking trails. With 53 miles of hiking trails in Griffith and more in Runyon Canyon, it is hard to imagine any needs assessment might find there are not enough trails to meet demand. There are no crowded or over-used trails within Griffith Park. In fact, there is a problem with new illegal and unauthorized trails in our drought-stressed habitat, and this activity needs to stop. The Plan’s recommendation should put the emphasis on protecting, maintaining and improving our existing authorized trails, with no mention of expanding trails.

6. TRANSIT OPTIONS FOR PARK VISITORS AND PARK CIRCULATION

Due to the increase in demand for tourists and recreationists to visit Griffith Park, a comprehensive transit plan should be included in the HCP to support the goal of reduced dependence on automobiles. This is especially important to avoid further adverse impacts to the residential areas north of Franklin Avenue and Los Feliz Boulevard. The plan should include transit options from METRO stations and other hubs in Hollywood and Los Feliz. A Hollywood Visitor Center in Hollywood or East Hollywood should be considered.

Feel free to contact us for any further clarifications on these comments or on Griffith Park.

Sincerely,



Gerry Hans
President

